



April 16, 2008

Via Email

Re: Support for Proposal 4—the Legacy Proposal

Dear Mayor Golding and members of the Task Force:

NRDC greatly appreciates the time and expertise the BRTF has devoted to making the MLPA work, and the role you have played in guiding the north central process. You encouraged us to place great weight on the SAT evaluations and on MPAs in the preferred size and high and very high protection categories. You also emphasized the importance of cross-interest support. The Proposal 4 team took your counsel to heart, aiming for a proposal that provides a legacy of healthy oceans for all Californians. Ultimately that is what will sustain the wide array of benefits the ocean provides.

Your guidance has helped produce considerable common ground among the proposals, but significant differences remain. We summarize below why Proposal 4 best meets the MLPA goals. Then we offer a more detailed comparison between proposals where the sites differ. Finally, we discuss who participated in developing Proposal 4 and how it addresses socio-economic issues.

Proposal 4 will best achieve MLPA goals

Proposal 4 did a better job than the other proposals of meeting the MLPA guidelines in virtually every category of the Science Advisory Team (SAT) evaluation. Following your guidance, it is anchored by preferred-size sites at the high and very high protection levels—key to protecting the full array of species likely to benefit. *Proposal 4 is the only network with four such areas, a number comparable to that in the Central Coast.* Proposal 4 also has more representative habitat (about twice as much kelp and deep rocky reef as 2-XA, more shallow rock, deep and shallow soft bottom, estuary, coastal marsh, surfgrass, rocky shore and sandy beach); more replication in state marine reserves (SMRs) and high protection areas; and equivalent spacing to other proposals with the exception of one habitat type at moderate high protection. Proposal 4 provided the most insurance value according to the modeling exercises. These achievements make it the investment most likely to yield strong and lasting conservation benefits.

Proposal 4 also incorporates the most high-quality habitat in places that are likely to produce long-term benefits for the region, such as biodiversity hotspots (SMR at Fitzgerald), centers of productivity (SMRs at Stewarts Point/Salt Point and North of Bodega Head) and sites with high restoration potential (Saunders Reef, Duxbury Reef,

Sea Lion Cove). The differences in habitat quality are greatest between 4 and 2-XA, and occur in the Saunders Reef to Salt Point stretch of coast, at Bodega Head, and at Fitzgerald Marine Park. We explain these differences in more detail below.

Proposal 4 incorporates higher quality habitat in backbone sites

Black Point to Salt Point State Park, Sonoma Coast: Proposal 4 includes a preferred size SMR (called Stewarts Point) that extends out to the state line to protect complex rocky reef and kelp and their communities, and ensure connectivity to deep-water ecosystems. It leaves more accessible parts of the park open for sport fishing and abalone diving, while including high relief and regionally rare deepwater habitat like that at Horseshoe Point, where the 50-meter depth line comes closer to shore than elsewhere in the region, resulting in a steep drop off and rugged rocky structure.

The State Parks Department supports Proposal 4 and has suggested moving the southern boundary up to Fisk Mill Cove to improve the feasibility of this site. The Proposal 4 team accepts the suggestion, which would also reduce the number of public abalone access points closed to one expert site.¹ In contrast, Proposal 2-XA establishes an inshore SMR and offshore SMCA further north at Sea Ranch, incorporating less complex and less extensive rocky habitat in a much smaller reserve. Proposal 2-XA will prevent abalone diving from five safe and well-used public access points at Sea Ranch.

Bodega Head. Proposal 4 establishes an SMR that protects structured rocky reef with varied habitat niches to the north of the head. Proposal 2-XA omits this key habitat by not extending its SMR as far north, choosing instead to extend SMCA protection to the flatter, less diverse habitat to the south of Bodega Head. That southern section (which appears as rock in the habitat analysis) is both a high energy environment and seasonally covered with sand, so provides only limited support to reef communities. Proposal 4 provides a high level of protection off Bodega Head in a cluster that includes more structure and more reef habitat. Proposal 2-XA's cluster is less protective, but its habitat value could be increased by moving its upper SMR boundary north by one minute.

Fitzgerald to Devil's Slide: Over 3 decades of data document the steep decline in landings of numerous species at Moss Beach and Fitzgerald Marine Park. A much longer record of studies documents the remarkable diversity of life here. The MLPA process provides a rare opportunity to reverse the record of decline and grant a true biological gem of the region the full protection it deserves.

Proposal 4 (and 1-3) establishes an SMR encompassing all of Fitzgerald Marine Park and the interconnected area stretching to the state line. This SMR would include the most diverse habitats that occur in this area—shale and granite reefs, rock pinnacles and ridges, crevices and cobbled valleys, surge channels, sea grass beds, giant kelp stands, coralline and drift algae, soft sediments, and on land, haul out sites for harbor seals and steller sea lions. Protecting habitat diversity is key to restoring the remarkable species diversity of this place (it supports 6 endemics and several listed species). The siting

¹ We would also support moving the northern boundary up half a mile to Black Point to close a single unintentional habitat gap--in shallow sand—in this proposal.

arrangement in Proposal 4 (and 1-3) will enhance study opportunities that build on the existing research record, protect one of California's most visited and studied marine education sites, and benefit from the involvement of San Mateo County law enforcement personnel.

In contrast, Proposal 2-XA has an SMCA, not an SMR, encompassing much of Fitzgerald Marine Park and the area offshore (with an SMR to the north instead, where the habitat is less complex and diverse). The SMCA allows take of commercial and recreational pelagic finfish, including salmon and forage fish like sardines and anchovies, Dungeness crab and squid. Given that 90% of the compliance problems in the Channel Islands have occurred in the small portion of that network made up of SMCAs, we believe the biodiversity hotspot in and along all of Fitzgerald Marine Park warrants the full protection of an SMR, not the partial protection of an SMCA.

Proposal 4 includes sites with high restoration potential

In addition to potentially helping meet goal 2 (to rebuild depleted species and sustain marine life populations) these sites may contribute to requirements for MPAs that help support the species covered by the Nearshore Fishery Management Plan or the Abalone Recovery and Management Plan.

Duxbury-Double Point, Marin County. One of the largest shale reefs in North America, Duxbury Reef supports rich and diverse invertebrate communities. Many people familiar with this area support protection there because of the decline in its rockfish populations over the last 30 years. Most of the rockfish caught here in a recent study were immature. Yet Duxbury continues to be an important destination for fishermen from San Francisco and nearby locations. Proposal 4 aims to protect part of the rockfish nursery in this area while allowing fishing for other popular species and leaving some of the reef open to all fishing. Proposal 2-XA omits this iconic place from its network and fails to protect a unique habitat with high restoration value.

Saunders Reef, Mendocino County: Proposal 4 (and 1-3) establishes a conservation area to help protect a highly productive kelp and reef habitat while still allowing two types of fishing, salmon and commercial sea urchin fishing important to Point Arena Harbor. This area has been heavily impacted by rockfish fishing. Proposal 2-XA misses out on an opportunity to protect a highly productive and locally unique reef in the largest expanse of bull kelp in the north central region. In early trips to the north coast, we learned that fishermen and other residents of Point Arena and Anchor Bay could support protection of Saunders Reef, and we worked with them to find a design they were comfortable with.

Sea Lion Cove, with its island and arch, waterfall, scenic cliffs and accessible inter-tidal, is a jewel of the Point Arena coast. If left intact, its ocean ecosystem could be a prized educational resource and natural heritage site—a place where kids could see thriving tide pools, an asset for the local community, and a spot that would draw visitors who care about the rugged, wild coast that makes Point Arena so unique.

Public access to Sea Lion Cove from shore opened in 2004 when the Stornetta Lands were bought with public funds. A team of scientists surveyed the area before its opening and found a broader range of sizes and greater abundance of abalone and other invertebrates than at nearby fished areas. The large number of young abalone indicates this site is a nursery. The scientists advised that the population was highly vulnerable to fishing due to the lack of a connected population in deeper water. That advice went unheeded, and when scientists surveyed again in 2007-08 they found a dramatic reduction of 79% in abalone of all sizes. Continuation of this pattern will further deplete a prized asset. Only Proposal 4 has an MPA here, despite local support for protection.

Proposal 4 has benefited from broad participation

Proposal 4 was developed with participation and consultation with local residents, scientists, divers, conservationists, state and federal agencies, business interests, and until the final design meeting, sport and commercial fishermen. Proposal 1-3 has the broadest support, but cross-interest involvement in Proposal 4 greatly influenced its design. Most of 4's MPAs involve accommodations for safety and fishing access. The Proposal 4 team values fishing as a vital part of the region's culture and economy, and in that spirit leaves open most of the coveted fishing spots. Examples include the areas around Arena Cove and Anchor Bay, from Salt Point to the Fort Ross Reef, the diverse area from Tomales Bluff to the western tip of Point Reyes Head, all of Duxbury for salmon fishing, part of it for rockfish, Pt Bonita, and the Half Moon Bay reef.

Proposal 4 has the highest conservation value with moderate short-term costs.

Proposal 4 has moderate commercial and recreational impacts, according to the analysis of worst-case economic effects. That analysis makes the overly pessimistic assumption that fishermen cannot move to another location if an MPA closes part of their fishing grounds. By this analysis, Proposal 4's commercial worst-case estimate is 8%, compared to 14% for an earlier version of the proposal and 11% for the Central Coast adopted network. To achieve those reductions, members of the Proposal 4 team met with residents and varied interests up and down the coast and made countless modifications and tradeoffs. Point Arena is a good example, where repeated consultations with the harbor master, other fishermen, the mayor and other local interests produced a set of proposals that other groups have largely adopted. The Point Arena cluster provides high protection for a minimum-size but high-value area, with a full 2 miles radius around the harbor open for sport and commercial fishing, fishing open at Manchester Beach, and commercial urchin fishing allowed at Saunders Reef because of its importance to this small port.

The estimates of adverse impacts should be considered in context. Crisis management has been expensive for coastal communities. Landings in the region have dropped from 30 million to 10 million lbs. over the past 14 years, according to the Regional Profile. Over the same period, the number of fishing vessels has dropped from 1750 to 750. Fewer fisheries are now pursued. A recent study found that average fish size declined by 45% over the same period across a wide range of Pacific Coast species. These losses underscore how vulnerable the region is to human impacts. Along with improved fishery management, a robust network of protected areas in high quality habitats can help avoid losses like these in the future by creating havens for big, prolific fish and creating places

where all the interconnected parts of ecosystems can function. They can also draw visitors to an area with healthy tide pools and special ocean places. The socio-economic evaluation does not take these potential long-term benefits into account.

We believe the full benefits of MPAs can best be realized if California adopts a network strong enough to withstand future threats and pressures. We appreciate the opportunity to comment, and look forward to working with you and the RSG as you make your final decisions about sites in this region.

Sincerely,

Karen Garrison
Co-Director, NRDC Oceans Program